REMARKS/ARGUMENTS

The undersigned wishes to thank the examiner, and his supervisory primary examiner, for the many courtesies extended during the telephone interview conducted on April 29th, 2008. Pursuant to the issues discussed in that interview it is believed that the present amendments place the claims in condition for allowance. Is also the undersigned's understanding that if the examiner identifies any other allowable subject matter that may be introduced, or that if any informalities of drafting become apparent and may easily be corrected, that the examiner may contact the undersigned in order to discuss further amendments through an "examiner's amendment."

The examiner has rejected claims 1-19 under 35 USC 103(a) as being unpatentable over Rodriguez (U.S. Publication No. 20020042706), hereinafter Rodriguez, in view of Dunne et al (U. S. Patent No. 5740375), hereinafter Dunne et al.

> To establish a *prima facie* case of obviousness, ... the prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP §2143.

Claims 1-12 and 16 -19 have been canceled, claim 13 has been amended into independent form incorporating the limitations of claim 12 as well as new limitations, and new claims 20, 21 22 and 23 have been added. With respect to amended claim 13 and dependent claims 14 and 15, the examiner's rejection should be withdrawn because Rodriguez, in view of Dunne et al does not teach all the limitations of claims 13, 14 and 15, therefore, do not establish a *prima facie* case of obviousness with respect to claims 13, 14 and 15.

Amended claim 13 claims a first device in a first subnetwork to requesting a process from a second device in a second subnetwork different from the first subnetwork, wherein a broadcast relay in the first subnetwork detects a network wide broadcast packet and in response to the packet having a first subnetwork network-wide destination address, a broadcast host address and a destination port number; generates a unicast address changed packet from the detected packet by changing the network wide destination address to a unicast address of a broadcast relay in the second subnetwork; and outputs the unicast address-changed packet through a router configured

to prevent the first subnetwork network wide broadcast packet from reaching the second subnetwork to the second subnetwork broadcast relay.

Furthermore, the second broadcast relay receives the packet from the router, generates a second subnetwork type broadcast packet by changing the destination unicast address of the received packet to an address related to a second subnetwork type broadcast; and outputs the generated second subnetwork type broadcast packet inside the second subnetwork.

A second device on the second subnetwork receives the second subnetwork type broadcast packet and checks a port number of a protocol segment of the second subnetwork type broadcast packet and *performs a predetermined process if the port number corresponds to a process of the second device or takes no action if* the port number does not correspond to a process of the second device.

Thus the invention as presently claimed provides a novel and efficient method for a first device in a first subnetwork to efficiently request a process from a second device in a second subnetwork otherwise inaccessible due to subnetwork and router configurations, wherein the second device is efficiently targeted through identification of a process on the second device associated with a unique port number/process correlation on the second device. The present invention thus provides a novel and advantageous method for using existing and well-known subnetwork and router configurations to communicate between otherwise exclusive subnetwork's without violating subnetwork or router configuration standards, and further providing for enhanced security by narrowly targeting devices that may receive and process a given packet. More particularly, the targeted second device is defined and identified by a correspondence of a *port number* of *a protocol segment* to a specific *process on that client,* wherein if the packet is received by and other non-targeted device (one wherein the port number of the protocol segment does not correspondence to a specific process on that client), the receiving non-targeted device will take no action

Neither Rodriguez nor Dunne et al teach or suggest these limitations and specifically claimed. Rodriguez instead teaches "gateway nodes" that convert packets to *broadcast signals* which are broadcast to *every other node* in communication there with, which in turn convert to broadcast signals into protocol data units which are rebroadcast *across* to *every* other subnetwork broadcast. There is no teaching or suggestion as to enhancing security by narrowly targeting

devices who may process broadcast packets through correspondence of a port number of a protocol segment to a specific process on that client. Dunne et al not supply the missing teachings, but is instead relied upon with respect to teachings about router configurations.

Claims 14-15 and 20-21 depend upon and incorporate all of limitations of amended claim 13, and they are therefore believed also allowable over Rodriguez in view of Dunne et al. for the same reasons established above.

New claim 20 also further provides additional limitations wherein the second device of the amended claim 13 performs the predetermined process, outputs a process result second subnetwork network wide broadcast packet from the processing operation, and wherein the second broadcast relay detects the result, generates a unicast address changed packet from the result by changing a network wide destination address to a unicast address of the first broadcast relay and outputs the unicast address changed result through the router to the first broadcast relay. The first broadcast relay receives the unicast address-changed result packet, changes the destination unicast address of the result packet and outputs the changed packet to a predetermined client on the first subnetwork. The predetermined client checks a port number of a protocol segment of the changed result packet and either performs a predetermined client process if the port number corresponds to a predetermined client process or otherwise takes no action.

New claim 21 further claims that first subnetwork broadcast client broadcasting the first subnetwork network wide broadcast packet is different from the first subnetwork predetermined client; thus the initiating client and the ultimate target client on the first subnetwork are different clients, and thus if the initiating broadcast client were to receive the result packet it would take *no action*.

The present amendments and new claims are supported by the specification as originally filed. More particularly, the amendments to claim 13 are supported by the specification as originally filed at page 9 line 18 through page 10 line 15; page 10 line 27 through page 11 line 9, and page 13 line 11 through page 14 line 17. New claim 20 is supported by page 11 line 6 through line 23, and new claim 21 by page 11 line 24 through page 12 line 4.

New method claims 22 and 23 claim providing program code comprising instructions which, when executed on computer systems, cause the computer systems to perform methods or

processes analogous to the limitations claimed in claims 13 and 20, respectively, and they are thus also believed to be allowable.

In view of the foregoing, it is submitted that the subject claims distinguish patentably and non-obviously over the prior art of record. An early indication of allowability is earnestly solicited.

Respectfully submitted,

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/Patrick J. Daugherty/
Patrick J. Daugherty, Reg. No. 41,697
CUSTOMER NO. 26675

PJD:cg